

FILED

04/28/2022 DB

**THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ALBERT ROSSINI

Case No. 17 CR 522

Violations: Title 18, United States Code,
Sections 1344 and 3147

Superseding Indictment

Judge Tharp

Magistrate Judge Cummings

The SPECIAL JULY 2021 GRAND JURY charges:

1. At times material to this Indictment: Wintrust Bank, Green Dot Corporation, d/b/a Go Bank, JPMorgan Chase Bank N.A., Citibank, N.A., and U.S. Bank, N.A. (the "Banks") were financial institutions whose deposits were insured by the Federal Deposit Insurance Corporation.

2. Beginning no later than in or about November 2016, and continuing through July 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

ALBERT ROSSINI

defendant herein, and others known and unknown to the Grand Jury, knowingly participated in a scheme to defraud financial institutions and to obtain money and property owned by, and under the custody and control of such financial institutions, by means of materially false and fraudulent pretenses, representations, and promises, which scheme is further described below.

3. It was part of the scheme that ALBERT ROSSINI knowingly and fraudulently caused to be created, or obtained under false pretenses, checks drawn

on accounts held at the Banks in ROSSINI's name or in the names of third parties ("the fraudulent checks").

4. It was further part of the scheme that ALBERT ROSSINI provided the fraudulent checks to various individuals for the purpose of preventing or delaying those individuals from taking adverse action on debts ROSSINI owed them.

5. It was further part of the scheme that at times ALBERT ROSSINI knowingly and fraudulently deposited or caused to be deposited the fraudulent checks at the Banks, thereby temporarily inflating account balances so that ROSSINI could obtain cash withdrawn from the accounts.

6. It was further part of the scheme that on some occasions ALBERT ROSSINI successfully withdrew and caused to be withdrawn funds from the fraudulently inflated accounts before the Banks discovered that the fraudulent checks were invalid.

7. It was further part of the scheme that ALBERT ROSSINI opened or caused to be opened accounts in his own name at one or more of the Banks and then deposited into and issued from those accounts invalid checks for the purpose of fraudulently obtaining money based upon those invalid checks.

8. It was further part of the scheme that ALBERT ROSSINI converted the proceeds of the scheme to his own use and benefit.

9. It was further part of the scheme that ALBERT ROSSINI's actions exposed the Banks to a risk of loss, and caused actual losses to certain of the Banks.

10. It was further part of the scheme that ALBERT ROSSINI misrepresented, concealed, and hid and caused to be misrepresented, concealed, and hidden, the purposes of and the acts done in furtherance of the scheme.

11. On or about the dates set forth below, in the Northern District of Illinois, Eastern Division, and elsewhere,

ALBERT ROSSINI,

defendant herein, knowingly executed and attempted to execute the above-described scheme by depositing and causing to be deposited into a financial institution account the checks described below, with each deposit constituting a separate Count:

Count	Date of Deposit	Check Amount	Payor	Payee
1	March 7, 2017	\$2,100	A.F.T. JPS Imports International	Albert Rossini
2	May 23, 2017	\$5,300	Albert Rossini	Individual MB
3	May 24, 2017	\$6,664	A.F.T. JPS Imports International	Individual GS
4	May 24, 2017	\$7,800	Albert Rossini	Individual GS
5	July 25, 2017	\$25,000	A.F.T. JPS Imports International	Albert Rossini

All in violation of Title 18, United States Code, Section 1344; and

ALBERT ROSSINI,

defendant herein, committed the offenses set forth in Counts One through Five while on release under Chapter 207 of Title 18, United States Code, pursuant to an order of the United States District Court for the Northern District of Illinois;

In violation of Title 18, United States Code, Section 3147.

FORFEITURE ALLEGATION

The SPECIAL JULY 2021 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1344, as set forth in this Indictment, defendant shall forfeit to the United States of America any property which constitutes and is derived from proceeds traceable to the offense, as provided in Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to:

a. a personal money judgment in the amount of approximately \$10,500.

3. If any of the property described above, as a result of any act or omission by defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code Section 853(p).

A TRUE BILL:

FOREPERSON

Signed by Jason Yonan on behalf of the
UNITED STATES ATTORNEY